## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

**GREATER HOUSTON TRANSPORTATION** COMPANY, FIESTA CAB COMPANY, HOUSTON TRANSPORTATION SERVICES, LLC, NATIONAL CAB CO., INC., PASADENA TAXI CO., INC., AMERICAN MEMENTUM GROUP LLC, ATLAS LIMOUSINE LLC. CTI TRANSPORTATION, LLC. LIBAN INCORPORATED, AVANTI INT'L TRANSPORTATION, LTD., FIRST PRIORITY TRANSPORTATION, LLC., LONE STAR EXECUTIVE LIMOUSINE, LLC., DAWIT SAHLE, MOHAMED SAMATER, MERSHA AYELE, MOSES A. TESFAY, MELAKU SHUMIE, ABRAHAM TARKEGNE, KIDANE GHEBRESLASSIE, MOHAMED DIDI, CHAMPION CAB CO., GREATER SAN ANTONIO TRANSPORTATION COMPANY. ENTERPRISE TRANSPORTATION INC.

CIVIL ACTION NO.: 14-941

٧.

UBER TECHNOLOGIES, INC. and LYFT INC.

## AFFIDAVIT OF CORBETT PARKER

 $oldsymbol{\omega}$ 

STATE OF TEXAS

**COUNTY OF HARRIS** 

8000

"Before me, the undersigned notary, on this day personally appeared Corbett Parker, the affiant, a person whose identity is known to me. After I administered an oath to affiant, affiant testified:

- 1. My name is Corbett Parker. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.
- 2. Attached hereto as Exhibit A are true and correct copies of certified public records obtained from the City of Houston under a public records request. Included in these records are six citations against Uber and four citations against Lyft for violating Houston Ordinance 46-11.1, i.e. failure to register as a mobile dispatch service.

- 3. Attached hereto as Exhibit B are true and correct copies of public records I obtained, one being from the Deputy Director of Taxis and Accessible Services for the San Francisco Municipal Transportation Agency, and another being a letter from the Taxicab Administrator/Chief of the Bureau of Franchise & Taxicab Regulation, Los Angeles Department of Transportation. The former letter discusses the inadequacy of insurance coverage, while the latter describes 31 arrests of drivers operating illegal taxicab services in violation of the Los Angeles Municipal Code.
- 4. Attached hereto as Exhibit C are true and correct copies of public records I obtained from another lawsuit involving Uber. These records include City of Chicago ordinance violations, a cease and desist letter from the San Francisco Municipal Transit Agency, a citation from the California Public Utilities Commission, and a letter from the City of Dallas First Assistant City Attorney regarding Uber's lack of operating authority.
- 5. Attached hereto as Exhibit D are true and correct copies of news articles containing quotations from Uber. In the first article from September 12, 2012, Uber CEO Travis Kalanick is quoted as saying "If you only follow the rules, they will never let you make the city a better place." The second article from April 16, 2014, describes Uber as still offering rides despite a court order on its "ride-sharing service" and quotes Uber as saying it would "continue to provide [its] car-sharing platform.

Further affiant sayeth naught."

CORBETT PARKER

SUBSCRIBED AND SWORN BEFORE ME, the undersigned authority, personally appeared Corbett Parker, on this 18<sup>th</sup> day of April, 2014, to certify with my

hand and official seal of office.

JO VONNA HILL

Notary Public, State of Texas

My Commission Expires

December 26, 2017

[STAMP/SEAL]

NOTARY PUBLIC in and for THE STATE OF TEXAS